

***EXHIBIT D***

**INTERROGATORY NO. 12:** State in specific detail each and every action, inquiry and/or affirmative step You took to confirm, verify and/or investigate Defendants, including their history, background and their Communications and Statements and "representations" before making Your Donation.

**ANSWER:** Plaintiff took no actions to investigate Defendants' history or background but instead believed Defendants to be truthful and believed that they would not misrepresent matters to him.

6. Admit that You initially contacted Ric Gillespie about making a Donation to TIGHAR's NIKU VII expedition.

RESPONSE: Admit.

7. Admit that You were not solicited by Ric Gillespie or anyone with TIGHAR before making Your Donation to TIGHAR. NOTE: For purposes of responding "solicitation" means that contact regarding Your Donation to TIGHAR was initiated by Defendants.

RESPONSE: Qualified denial. TIGHAR made specific efforts to publicize its expedition and its efforts to find the Earhart wreckage. Plaintiff's response to TIGHAR and contact with Ric Gillespie was a direct result of those efforts.

8. Admit that You and You alone are who made the decision to make Your Donation to TIGHAR.

RESPONSE: Admit.

9. Admit that You and You alone made the decision about the size of Your Donation to TIGHAR.

RESPONSE: Admit.

10. Admit that before You made Your Donation, You did not ask to see any videotape or other recordings made recorded during the NIKU VI expedition.

RESPONSE: Admit.

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12. Admit that before You made Your Donation, You did not see any videotape recorded during the NIKU VI expedition.

RESPONSE: Admit.

31. Admit You never asked Ric Gillespie whether TIGHAR found Earhart Artifacts.

RESPONSE: Admit.

33. Admit You never asked Mr. Gillespie any specific questions about the findings from the NIKU VI expedition.

RESPONSE: Admit.

36. Admit You never asked any person to evaluate any TIGHAR materials before making Your Donation to TIGHAR.

RESPONSE: Admit.

37. Admit TIGHAR is a non-profit organization.

43. Admit You had no contract with TIGHAR regarding Your Donation.

RESPONSE: Admit.

44. Admit TIGHAR never promised that it would locate Earhart Artifacts in